

Filed  
\$ 75.00  
25606437

IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

PHYLLIS ANDREWS, *et al.*,

Plaintiffs,

v.

ARTHUR B. MODELL,

Defendant.

Civil Action No. : 07-3368 (SCR)

FILED  
U.S. DISTRICT COURT  
2007 MAY 16 A 10:19  
S.D. OF N.Y. W.P.

MOTION TO ADMIT COUNSEL PRO HAC VICE

In accordance with Rule 1.3(c) of the Local Rules of the U.S. District Courts for the Southern and Eastern Districts of New York, I, Claudia T. Morgan, a member in good standing of the bar of this Court, hereby move for an order allowing the admission pro hac vice of Steven F. Barley, Douglas R. M. Nazarian, and Daniel J. Jawor.

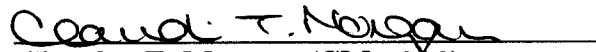
Mr. Barley is a partner with the law firm of Hogan & Hartson LLP, 111 South Calvert Street, Suite 1600, Baltimore, MD 21202. He may be reached by telephone at (410) 659-2700 and by facsimile at (410) 539-6981. Mr. Barley is a member in good standing of the Bar of the State of Maryland, and is admitted to practice law in the U.S. Court of Appeals for the Fourth Circuit and the U.S. District Court for the District of Maryland. There are no pending disciplinary proceedings against Mr. Barley in any state or federal court.

Mr. Nazarian is a partner with the law firm of Hogan & Hartson LLP, 111 South Calvert Street, Suite 1600, Baltimore, MD 21202. He may be reached by telephone at (410) 659-2700 and by facsimile at (410) 539-6981. Mr. Nazarian is a member in good standing of the bars of the State of Maryland, the State of New York, and the District of Columbia. He is admitted to practice law in the U.S. Court of Appeals for the Fourth Circuit, and in the U.S. District Courts for the District of Columbia, District of Maryland, and Eastern District of Michigan. There are no pending disciplinary proceedings against Mr. Nazarian in any state or federal court.

Mr. Jawor is an associate with the law firm of Hogan & Hartson LLP, 111 South Calvert Street, Suite 1600, Baltimore, MD 21202. He may be reached by telephone at (410) 659-2700 and by facsimile at (410) 539-6981. Mr. Jawor is a member in good standing of the bars of the State of Maryland and the District of Columbia. He is admitted to practice law in the U.S. Court of International Trade. There are no pending disciplinary proceedings against Mr. Jawor in any state or federal court.

DATED: May 15, 2007

Respectfully submitted,

  
Claudia T. Morgan (CM 1998)  
Hogan & Hartson LLP  
44 S. Broadway, Third Floor  
White Plains, NY  
(212)918-8300

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**CERTIFICATE OF SERVICE**

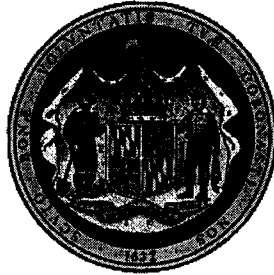
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I certify that on this 16<sup>th</sup> day of May 2007 I sent a true copy of the foregoing document, entitled, Motion To Admit Counsel Pro Hac Vice, together with the supporting affidavit and proposed order, to counsel for plaintiffs by first class mail, postage pre-paid, at the following address:

Christopher M. Green  
Daniel E. Holloway  
Lisa M. Nousek  
BOIES, SCHILLER & FLEXNER LLP  
333 Main Street  
Armonk, NY 10504

  
Claudia T. Morgan

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

***STATE OF MARYLAND, ss:***

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the eighteenth day of December, 1990,*

**Steven Francis Barley**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

***In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
twenty-sixth day of April, 2007.***

  
Clerk of the Court of Appeals of Maryland

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

***STATE OF MARYLAND, ss:***

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the thirteenth day of December, 1995,*

**Douglas Richard Miller Nazarian**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

***In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
twenty-sixth day of April, 2007.***

A handwritten signature in cursive script, reading "Alexander L. Cummings", written over a horizontal line.

***Clerk of the Court of Appeals of Maryland***

**SUPREME COURT OF  
THE STATE OF NEW YORK  
APPELLATE DIVISION, FOURTH DEPARTMENT  
ROCHESTER, NEW YORK**

*I, JOANN M. WAHL, Clerk of the Appellate Division of the Supreme Court in the Fourth Judicial Department, State of New York, do hereby certify that*

***DOUGLAS RICHARD NAZARIAN***

*was duly admitted to practice as an attorney and counselor at law in all courts of this state by this Court on, **September 9, 1992**, and appears in good standing upon the roll of attorneys and counselors, and other records, in this office and has registered with the administrative office of the Courts as required by Judiciary Law §468-a.*

***IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of this Court, at the City of Rochester, May 2, 2007.***



*Joann M. Wahl*  
\_\_\_\_\_  
Clerk of the Court



**District of Columbia Court of Appeals**  
**Committee on Admissions**  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

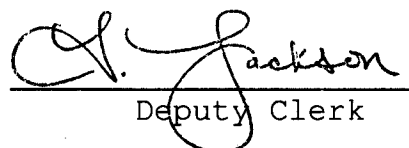
DOUGLAS R. M. NAZARIAN

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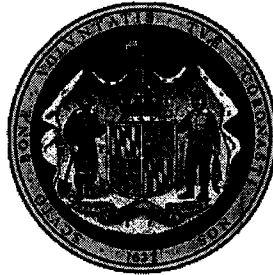
was on the 4<sup>TH</sup> day of OCTOBER, 1993  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on May 4,  
2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

***STATE OF MARYLAND, ss:***

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the sixteenth day of December, 2003,*

**Daniel Jawor**

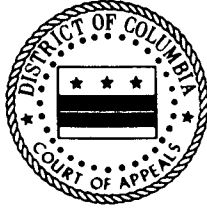
*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

***In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
twenty-sixth day of April, 2007.***

A handwritten signature in cursive script, reading "Alexander L. Cummings".

***Clerk of the Court of Appeals of Maryland***





**District of Columbia Court of Appeals**  
**Committee on Admissions**  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

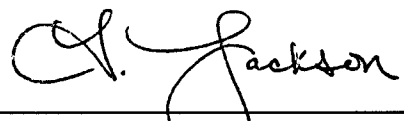
DANIEL J. JAWOR

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was on the 6<sup>TH</sup> day of MAY, 2005  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on May 4,  
2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

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PHYLLIS ANDREWS, *et al.*,

Plaintiffs,

v.

ARTHUR B. MODELL,

Defendant.

Civil Action No. : 07-3368 (SCR)

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**DECLARATION OF CLAUDIA T. MORGAN IN SUPPORT OF  
MOTION TO ADMIT COUNSEL PRO HAC VICE**

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1. My name is Claudia T. Morgan. I am an attorney with Hogan & Hartson LLP, counsel for defendant in the above captioned action. I am familiar with the proceedings in this case. I make this declaration based on my personal knowledge of the facts set forth herein and in support of the motion to admit Steven F. Barley, Douglas R. M. Nazarian, and Daniel J. Jawor as counsel pro hac vice to represent defendant in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on June 22, 1999. I am also admitted to the bar of the U.S. District Court for the Southern District of New York and am in good standing with this Court.

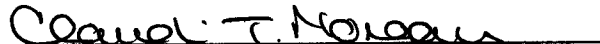
3. Mr. Barley joined Hogan & Hartson in 2000. Mr. Nazarian joined Hogan & Hartson in 1995. Mr. Jawor joined Hogan & Hartson in 2005.

4. I have found Messrs. Barley, Nazarian, and Jawor to be skilled attorneys and persons of integrity. They are experienced in federal practice and are familiar with the federal rules of procedure.

5. For the foregoing reasons, I respectfully request that Steven F. Barley, Douglas R. M. Nazarian, and Daniel J. Jawor be admitted to practice before this Court pro hac vice.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: May 15, 2007  
White Plains, NY

  
Claudia T. Morgan (CM 1998)

**IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

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PHYLLIS ANDREWS, *et al.*,

Plaintiffs,

v.

Civil Action No. : 07-3368 (SCR)

ARTHUR B. MODELL,

Defendant.

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**ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION**

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Upon the motion and supporting affidavit of Claudia T. Morgan, attorney for Defendant Arthur B. Modell, it is hereby ORDERED that Steven F. Barley, Douglas R.M. Nazarian, and Daniel J. Jawor are admitted to practice pro hac vice as counsel for Defendant Arthur B. Modell in the above captioned case in the U.S. District Court for the Southern District of New York.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2007.

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U.S. District / Magistrate Judge